TECHNICAL REVIEW DOCUMENT for OPERATING PERMIT 960PWE162

to be issued to:

Metal Container Corporation - Windsor Facility
Weld County
Source ID 1230134

Prepared by Doris Jung on August 17, 1998

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. The conclusions made in this report are based on information provided in the original application submittal of February 23, 1996 and additional information submitted March 24, 1998. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting hours of operation.

II. Source Description

This source is classified as an aluminum beverage can manufacturer defined under Standard Industrial Classification 3411. Metal Container Corporation manufactures the bodies of 2 piece-aluminum beverage cans. The plant has two process lines (Lines No. 1 and 2) which have emissions from natural gas fired ovens/boilers, can forming equipment, surface coating operations and miscellaneous combustion sources. Each process line consists of front-end and back-end operations. The front-end includes

cupping and bodymaking units which form the cans from aluminum coil, followed by washers which clean the can bodies for decorating. The back-end comprises the surface coating operations. A portion of the cans made are basecoated and cured in a natural gasfired oven and then routed to decorators where the exterior of the can is printed with high solid inks. Cans that are not basecoated are routed directly to the decorators and cured in natural gas-fired ovens. The cans are then roll-coated with a water-based overvarnish and rim varnish before being cured in natural gas-fired ovens. The inside of the can is sprayed with a water-based coating and cured in natural gas-fired ovens. Following the coating operations, the cans are necked, reformed, tested, and palletized prior to warehousing for shipment. The boilers supply low pressure hot water for the washers. The miscellaneous combustion sources supply building heat.

The facility is located southeast of Windsor on the north side of County Road 66 in the Windsor Industrial Park, Weld County. The area in which the plant operates is designated as attainment for all criteria pollutants. There is one affected state within 50 miles of the plant: Wyoming. The following Federal Class I designated areas are within 100 kilometers of the plant: Rawah Wilderness Area and Rocky Mountain National Park. The pollutants of concern are Carbon Monoxide (CO), Volatile Organic Compounds (VOC), Particulate Matter (PM), and Particulate Matter less than 10 microns (PM 10), and Hazardous Air Pollutants (HAPs). Facility wide potential emissions based on data submitted with the Title V application and actual emissions based on the APENs on file with the Division are as follows in tons per year (tpy):

| Pollutant | Potential Emissions (tpy) | Actual Emissions (tpy) |
|------------------|---------------------------|------------------------|
| NO _x | 45 | 42.9 |
| CO | 38 | 10.7 |
| VOC | 245.0 | 244.5 |
| PM | 8.4 | 6.6 |
| PM_{10} | 8.4 | 6.6 |
| HAPs | 111 | 111 |

A facility-wide permit has been issued to this source that limits total VOC emissions to a maximum of 245 tpy. Based on the information provided, the source is currently considered to be a synthetic minor source for VOC (Potential to Emit < 250 tpy) for purposes of Prevention of Significant (PSD) regulations as defined in Colorado Regulation No. 3, Part A, Section I.B.58. The source may not exceed these levels unless a permit is first obtained to comply with PSD rules.

This facility currently has no applicable MACTs but is subject to Standards of Performance for the Beverage Can Surface Coating Industry. (Colorado Regulation No. 6, Part A, Subpart WW, Federal 40 CFR § 60.490 through § 60.496). However, a MACT for Metal Can Surface Coating is scheduled to be promulgated in November 2000. Metal Container Corporation indicated that the Windsor Facility is not a 112(r) source and certified to operating in compliance with all applicable requirements at the time of their application submittal on February 23, 1996.

III. Emission Sources

The following sources are specifically regulated under terms and conditions of the Operating Permit for this Site:

Units B001 and B002: Cleaver Brooks Boilers, Model CB 700-300; S/N: L83229 and L83228, 12.553 MMBtu/hr, Natural Gas Fired.

Unit B003: Industrial Sheet Metal & Mechanical Make-up Air Heaters, Model: Unknown, S/N: 223-110-090, 223-110-091, 223-110-093, 2-10.3 MMBtu/hr, 1-13.1 MMBtu/hr, Natural Gas Fired.

Insignificant Combustion Sources (fuel burning equipment for process heat < 5 MMBtu/hr, fuel burning equipment for building heat < 10 MMBtu/hr)

1. Applicable Requirements

A facility-wide permit was issued to the source, initial approval Colorado Construction Permit 95WE195. Prior to the issuance of the facility-wide permit, the boilers were permitted under final approval Colorado Construction Permits 86WE191-1 and 2. The boilers were installed in 1988, prior to the New Source Performance Standard Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) applicability date of June 9, 1989. The heaters were permitted under Colorado Construction Permit 92WE1354 (processed with the facility-wide permit).

The facility has numerous combustion sources that qualify as insignificant activities under Colorado Regulation No. 3, Part C, Section II.E.3. During pre-draft source review, Metal Container brought to the Division's attention that there is only one fuel meter for the entire facility. Instead of requiring Metal Container to install a fuel meter for each significant combustion unit, the Division suggested that Metal Container monitor fuel use for all combustion sources for simplicity. During this discussion, a revision to the AP-42 (EPA Compilation of Air Pollutant Emission Factors) emission factors was published. Metal Container agreed to monitor facility-wide fuel use. Metal Container only requested changes in emission limits for NO_{x} and CO were modified to accomodate the changes in emission factors and the emissions from insignificant combustion sources. The increase in emission limits for NO_{x} and CO are 2 tpy and 27.2 tpy, respectively. These increases do not trigger any additional requirements. The applicable requirements for **all** combustion emission units are the following:

- NO_x : 45 tpy
- CO: 38 tpy
- Facility-wide VOC: 245.0 tpy (Colorado Construction Permit 95WE195)
- Facility-wide PM: 8.4 tpy (Colorado Construction Permit 95WE195)
- Facility-wide PM₁₀: 8.4 tpy (Colorado Construction Permit 95WE195)
- Maximum Allowable Particulate Emissions Standard for fuel burning equipment (Colorado Regulation No. 1, Section III.A.1.b)

Where: PE = Allowable Particulate emissions (lb/MMBtu)

FI = Fuel Input (MMBtu/hr)

Fuel Use limited to 912 MMscf/yr

- 20% Opacity limitation during normal operations (Colorado Regulation No. 1, Section II.A.1)
- APEN Reporting (Colorado Regulation No. 3, Part A, Section II)

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permit was issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for Colorado Construction Permit 95WE195 and the appropriate provisions of the construction permit have been directly incorporated into this operating permit.

2. Emission Factors

Emissions from boilers and heaters are produced during the combustion process, and are dependent upon the specific properties of the natural gas being burned. The pollutants of concern are NO_x , CO, VOC, SO_2 , PM, and PM_{10} . The AP-42 (EPA Compilation of Air Pollutant Emission Factors, March 1998) emission factors for small boilers from Tables 1.4-1 and 2, adjusted to 1,000 Btu/scf, are listed below:

| | AP-42 Emission |
|------------------|-------------------|
| <u>Pollutant</u> | Factor (lb/MMscf) |
| NO_x | 98 |
| CO | 82 |
| VOC | 5.4 |
| SO ₂ | 0.6 |
| PM | 7.5 |
| PM_{10} | 7.5 |

 SO_2 annual emissions are 0.27 tpy at maximum fuel consumption. Since annual SO_2 emissions are less than the APEN de minimis level of 2 tpy, SO_2 emissions limits were not included in the Colorado Construction Permit 95WE195 and will not be included in the Operating Permit.

3. Monitoring Plan

Metal Container has proposed to calculate emissions for fee purposes based on fuel consumption and the fuel based emission factors listed above. They will be required to conduct the emissions calculations on a monthly basis with semi-annual reports and an annual compliance certification. This is consistent with the gas-fired boiler monitoring grid developed by the Division (attached).

Monthly emissions from this emission unit shall be summed with the monthly emissions

from other emission units and a twelve month running total of facility-wide emissions will be maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data.

At the largest design fuel input rate of 13.1 MMBtu/hr and a natural gas heating value of 1000 Btu/scf, the most stringent allowable PM emission standard (PE) and the maximum PM emissions from natural gas combustion were determined (see equations below). The maximum PM emissions from combustion is 0.0075 lb PM/MMBtu, which is well below the PE of 0.26 lb PM/MMBtu. Compliance with the PM emission standard shall be ensured by burning natural gas.

$$\frac{BE}{NBB} = 0.5(8.1)^{-0.25} = \frac{0.25 \ b \ RM}{NBB}$$

$$\frac{b \ RM}{NBB} = \frac{7.5 \ b \ RM}{NBB} \times \frac{NBB}{NBB} = \frac{0.055 \ b \ RM}{NBB}$$

The Opacity standard of 20% will be monitored by the use of natural gas. Inspectors may verify this with EPA Method 9 opacity readings, if necessary.

A revised APEN must be submitted to the Division as required by Colorado Regulation No. 3, Part A, Section II. C.

4. Compliance Status

Current APENs reporting 1996 emissions for these emission units are on file with the Division. No records indicating non-compliance were found in a review of the facility's Division files and the source certified in their application that they are currently in compliance with all current applicable requirements. Therefore, these units are currently considered to be in compliance with all applicable requirements.

Unit P001 - Can Forming Operations

1. Applicable Requirements

A facility-wide permit was issued to the source, initial approval Colorado Construction Permit 95WE195. The equipment covered under this emission unit and the Colorado Construction Permit issued for each equipment unit prior to the issuance of the facility-wide permit are described below:

| Equipment | Control Equipment | Permit No. |
|--|---|---------------|
| Standun Bodymakers, Model B318, and S/Ns: 72501-72506, and Oil Mist Lubrication System for Beverage Can Body Presses for Line No. 1. | Balston Units #1 and #2, Mist Eliminators (Model R-3080, S/Ns: N/A) with Airpro Filters (Model 200) and Air Make-up Units. | 86WE191- 4 |

| Equipment | Control Equipment | Permit No. |
|--|---|---------------|
| Standun Bodymakers, Model B318, and S/Ns: 725120, 725110, 725100, 725090, 725080, 72507, and Oil Mist Lubrication System for Beverage Can Body Presses for Line No. 2. | Balston Units #3 and #4, Mist Eliminators (Model R-3080, S/Ns: N/A) with Airpro Filters (Model 200) and Air Make-up Units. | 92WE399- 1 |
| Can Elevators for Lines No. 1 and No. 2 | Two (2) - Wet Can Inverter Mist Filters, Model & S/Ns: Unknown. | 92WE399- 2 |
| One (1) Aluminum Scrap Handling System, Make, Model & S/N: Unknown, Capacity and Construction Details: Unknown. | Bloapco Cyclone | 96WE060 |

The aluminum scrap handling system was previously permitted under Colorado Construction Permit 86WE191-8. However, when the emission factor for this system was revised, the Division permitted the system again under another Colorado Construction Permit 96WE060. Hence, one aluminum handling system is permitted under two Colorado Construction Permits. Also, the system was referenced twice in Colorado Construction Permit 95WE195, implying that there are two aluminum scrap handling systems in the facility. One aluminum scrap handling system permitted under the latest Colorado Construction Permit is referenced in this Operating Permit. The applicable requirements for this emission unit are the following:

- Facility-wide PM: 8.4 tpy (Colorado Construction Permit 95WE195)
- Facility-wide PM₁₀: 8.4 tpy (Colorado Construction Permit 95WE195)
- Aluminum scrap throughput limited to 4,500 tpy (Colorado Construction Permit 95WE195)
- 20% Opacity limitation during normal operations (Colorado Regulation No. 1, Section II.A.1)
- APEN Reporting (Colorado Regulation No. 3, Part A, Section II)

As mentioned above, the due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permit was issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for Colorado Construction Permit 95WE195 and the appropriate provisions of the construction permit have been directly incorporated into this operating permit.

2. Emission Factors

Activity

Can forming operations emissions consist of PM and PM₁₀ from scrap aluminum handling, can elevator exhaust, and oil mist lubrication systems. The Division-approved emission factors for each activity are listed below:

Aluminum Scrap Handling
Oil Mist Lubrication System
Can Elevator Exhaust

0.45 lb/ton of aluminum scrap 0.10 lb/hr per production line 0.10 lb/hr per production line

The scrap aluminum handling emission factor uses a cyclone efficiency of 85%. The emission factors for the oil mist lubrication system and the can elevator were determined from an uncontrolled lubricant aerosol emission rate of 11.2 lb/hr and a lubricant aerosol water content of 94%. The control efficiencies for the mist eliminators with filters and the wet can inverter mist filters are 85% and 87%, respectively.

3. Monitoring Plan

Metal Container has proposed to calculate emissions for fee purposes based on the emission factors listed above. They will be required to conduct the emissions calculations on a monthly basis with semi-annual reports and an annual compliance certification.

Monthly emissions from this emission unit shall be summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions will be maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data.

Control Equipment (cyclone, mist eliminators with filters, and wet can inverter mist filters) inspection and maintenance procedures will be used to ensure continuing optimal function of the control equipment for aluminum scrap handling, oil mist lubrication systems, and can elevators. This emission unit shall comply with the Opacity standard of 20%. Inspectors may verify this with EPA Method 9 opacity readings, if necessary.

A revised APEN must be submitted to the Division as required by Colorado Regulation No. 3, Part A, Section II. C.

4. Compliance Status

Current APENs reporting 1996 emissions for equipment covered under this emission unit are on file with the Division. No records indicating non-compliance were found in a review of the facility's Division files and the source certified in their application that they are currently in compliance with all current applicable requirements. Therefore, this unit is currently considered to be in compliance with all applicable requirements.

Unit P002 - Can Coating Operations

1. Applicable Requirements

A facility-wide permit was issued to the source, initial approval Colorado Construction Permit 95WE195. The equipment covered under this emission unit and the Colorado

Construction Permit issued for each equipment unit prior to the issuance of the facility-wide permit are described below:

| Equipment | Control Equipment | Permit No. |
|--|--------------------------------|------------|
| One (1) Make, model & S/N: N/A, basecoat and sizecoat bulk storage tank, capacity and construction details: N/A. | None | 86WE191-5 |
| One (1) Make, model & S/N: N/A, inside spray coating storage tank, capacity and construction details: N/A. | None | 86WE191-6 |
| One (1) Make, model & S/N: N/A, overvarnish coating storage tank, capacity and construction details: N/A. | None | 86WE191-7 |
| Line No. 1 Inside spray and bottom varnish surface coating system: Six (6) Make, model & S/N: N/A, inside spray machines, together rated at 16.4 gal/hr, bottom varnish rated at 0.8 gal/hr. Fugitive VOC Emissions. | Mikro- Pulsaire Baghouse | 86WE191-16 |
| Line No. 2 Inside spray and bottom varnish surface coating system: Six (6) Make, model & S/N: N/A, inside spray machines, together rated at 16.4 gal/hr, bottom varnish rated at 0.8 gal/hr. Fugitive VOC Emissions. | Mikro- Pulsaire Baghouse | 86WE191-17 |
| Fugitive VOC Emissions from Clean-up Operations. | None | 86WE191-18 |
| One (1) Reynolds, Model DG250, S/N: N/A, inside spray machine, rated at 1.5 gal/hr (respray defectively coated cans). | Mikro- Pulsaire Baghouse | 89WE054 |
| Parts Cleaners: One (1) Safety-Kleen, Model 44, S/N: N/A. Two (2) Greymills, Model 902-4, S/N: N/A. | None | 90WE455-1 |
| Line No. 1 Decorator system: One (1) Make,model & S/N: N/A, decorator, rated at 0.8 gal/hr ink throughput. One (1) Make, model & S/N: N/A, overvarnisher coater, rated at 8.4 gal/hr. Fugitive VOC emissions | None | 86WE191-14 |
| Line No. 2 Decorator sytem: One (1) Make, model & S/N: N/A, decorator, rated at 0.8 gal/hr ink throughput. One (1) Make, model & S/N: N/A, overvarnish coater, rated at 8.4 gal/hr. Fugitive VOC emissions | None | 86WE191-15 |
| Line No. 1 Basecoat surface coating system: One (1) Make, model & S/N: N/A, Basecoater, rated at 8.7 gal/hr. Fugitive VOC emissions | None | 86WE191-12 |
| Line No. 2A Decorator system: One (1) Ragsdale 8-color decorator, model & S/N: N/A, rated at 0.8 gal/hr ink throughput. One (1) Ragsdale overvarnish unit, model & S/N: N/A, rated at 8.4 gal/hr. One (1) Belvac varnish unit, model & S/N: N/A, rated at 0.8 gal/hr. Fugitive VOC emissions | None | 86WE191-13 |

Colorado Construction Permit 95WE195 lists five parts cleaners. However, additional information submitted March 24, 1998 by Metal Container clarified that 2 parts cleaners

have been removed and only 3 parts cleaners are installed, one (1) Safety-Kleen and two (2) Greymills. This emission unit is subject to the New Source Performance Standards (NSPS) for the Beverage Can Surface Coating Industry (attached). The applicable requirements for this emission unit are the following:

- Facility-wide VOC: 245.0 tpy (Colorado Construction Permit 95WE195)
- Facility-wide PM: 8.4 tpy (Colorado Construction Permit 95WE195)
- Facility-wide PM₁₀: 8.4 tpy (Colorado Construction Permit 95WE195)
- Fugitive emissions control techniques and work practices (Colorado Construction Permit 95WE195, Colorado Regulation No. 7, Section IX.A.7)
- NSPS for the Beverage Can Surface Coating Industry (Colorado Construction Permit 95WE195, Colorado Regulation No. 6, Part A, Subpart WW and Federal 40 CFR 60.490 through 60.496)
- General Provisions of NSPS (Colorado Construction Permit 95WE195, Colorado Regulation No. 6, Part A, Subpart A and Federal 40 CFR 60.1 through 60.19)
- 20% Opacity limitation during normal operations (Colorado Regulation No. 1, Section II.A.1)
- APEN Reporting (Colorado Regulation No. 3, Part A, Section II)

As previously mentioned, the due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permit was issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for Colorado Construction Permit 95WE195 and the appropriate provisions of the construction permit have been directly incorporated into this operating permit.

2. Emission Factors

VOC emissions from the can coating operations are determined by multiplying the mass consumption of each material (coatings, inks, and solvents) and the percent mass of non-exempt VOC in the material. Thus, emissions calculations are based on information in the most current Material Safety Data Sheet (MSDS) for each material.

Most of the overspray from the inside spray and bottom varnish surface coating system are captured by a baghouse. The estimated overspray not captured by the baghouse are considered particulate emissions and are estimated from the equation below:

PM (100% PM₁₀) = V x P x (1-
$$\eta_{transfer}$$
) x ρ x $\eta_{baghouse}$

Where: V = Volume of inside spray material used

P = Volume of solids per volume of inside spray

material

 $\eta_{transfer}$ = Transfer Efficiency (80% - from AP-42 for airless

spray of flat surfaces

ρ = Density of solids (from MSDS datasheet)

η_{baghouse} = Baghouse control efficiency

Baghouse control efficiency is considered 99% if baghouse inspection and maintenance procedures as described in Condition 3.2.1 and 3.2.2 are met.

The NSPS Standards for Volatile Organic Compounds (Federal 40 CFR 60.492) are the following, based on volume-weighted calendar-month average emissions:

- (A) 0.29 kg of VOC per liter (2.42 pounds per gallon) of coating solids from each twopiece can exterior base coating operation, except clear base coat;
- (B) 0.46 kg of VOC per liter (3.83 pounds per gallon) of coating solids from each twopiece can clear base coating operation and from each overvarnish coating operation; and
- (C) 0.89 kg of VOC per liter (7.42 pounds per gallon) of coating solids from each twopiece can inside spray coating operation.

After each coat has been applied (basecoat, decoration, and inside spray/bottom varnish), the can is dried in a drying/curing oven. The ovens are rated less than 5 MMBtu/hr and fall under the insignificant activity category of Regulation No. 3, Part C, Section II.E.3.k. Therefore, emissions from the ovens are considered insignificant activities for the Operating Permit.

3. Monitoring Plan

Metal Container has proposed to calculate emissions for fee purposes based on the emission factors listed above. They will be required to conduct the emissions calculations on a monthly basis with semi-annual reports and an annual compliance certification. Metal Container has proposed to record coating, ink, and cleanup material usage on a weekly basis and can production rate daily to calculate daily usage rates and VOC emissions.

Monthly emissions from this emission unit shall be summed with the monthly emissions from other emission units and a twelve month running total of facility-wide emissions will be maintained to verify compliance with the annual emission limitations. Each month, a new twelve month total shall be calculated using the previous twelve months data.

Calculations to determine compliance with NSPS standards shall follow the emission rate calculation requirements as stated in Federal 40 CFR 60.493.

To minimize fugitive VOC emissions, the source is required to utilize fugitive control techniques and work practices.

Baghouse inspection and maintenance procedures will be used to ensure continuing optimal function of the control equipment for each of these processes. This emission unit shall comply with the Opacity standard of 20%. Inspectors may verify this with EPA Method 9 opacity readings, if necessary.

A revised APEN must be submitted to the Division as required by Colorado Regulation No. 3, Part A, Section II. C.

4. Compliance Status

Current APENs reporting 1996 emissions for the equipment covered under this emission unit are on file with the Division. No records indicating non-compliance were found in a review of the facility's Division files and the source certified in their application that they are currently in compliance with all current applicable requirements. Therefore, this unit is currently considered to be in compliance with all applicable requirements.

IV. Insignificant Activities

The source has a facility-wide permit to establish a synthetic minor source status for PSD by limiting its VOC emissions to a maximum of 245 tpy. Since the synthetic minor permit was issued at less than 10% below the synthetic minor level, the source will be required to track VOC emissions from insignificant activities. The source shall identify all insignificant activities that are sources of VOC emissions and calculate actual VOC emissions from the insignificant activities annually. The source will be considered major for future purposes of PSD regulations if total facility-wide VOC emissions, including VOC emissions from insignificant activities, exceed 250 tpy.

In the Title V Operating Permit Application, submitted February 23, 1996, emission units were identified by Metal Container that qualify as insignificant activities. The emission units are summarized below. The letter in parentheses after the equipment description indicates under which exemption in Colorado Regulation No. 3, Part C, Section II.E.3 the equipment qualifies as an insignificant activity.

Lime Silo. (a)
Oil Separation and holding tanks. (a)
Bodymaker coolant storage tank. (a)
Washer chemical storage tank. (a)
Wastewater treatment tank. (a)
Sulfuric Acid Bulk Tank. (a)
Inker Cleaner. (a)

Ink Dot Identification System/Clean-up. (a) Hydraulic oil (bodymaker) bulk tank. (aaa) Cupper lube tank. (aaa) Propane cylinders. (bbb) Diesel storage tank. (fff) Building heaters/water heaters. (ggg)

Line No. 1 Drying/Curing Ovens, 1.45 MMBtu/hr (2), 3.08 MMBtu/hr (1). (k) Line No. 2 Drying/Curing Ovens, 1.45 MMBtu/hr (2), 3.08 MMBtu/hr (1). (k) Fourteen (14) natural gas heaters, rated less than 5 MMBtu/hr. (k) Two (2) can washers with natural gas dryers, rated at 3.17 MMBtu/hr. (a, b, k) Internal combustion engine powering an emergency water pump. (nnn) Three (3) natural gas heaters for space heating, 6.2 MMBtu/hr (2), 7.4 MMBtu/hr. (ggg)

V. Alternative Operating Scenarios

There were no alternative operating scenarios requested.

VI. Permit Shield

No specific regulations were cited by Metal Container Corporation as non-applicable to this source. However, for clarification, the Division will cite the New Source Performance Standard Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as non-applicable to the source.

VII. Short Term Limits Deleted from Operating Permit

| Construction Permit | Emission Unit | Sho | rt Term Limit |
|---------------------|---------------|--------------------|---------------|
| 95WE195 | Facility-Wide | NO _x : | 10.0 lb/hr |
| | | CO: | 2.5 lb/hr |
| | | VOC: | 70.0 lb/hr |
| | | PM: | 2.7 lb/hr |
| | | PM ₁₀ : | 2.7 lb/hr |